

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

NOV 16 2022

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
v.)
)
) No. **4:22CR639-MTS/SRW**
RAY BRADLEY and)
MOREION LINDSEY,)
)
Defendants.)

INDICTMENT

COUNT I

[CONSPIRACY TO COMMIT MURDER FOR HIRE: 18 U.S.C. §1958]

The Grand Jury further charges that:

Beginning at a time unknown to the Grand Jury, but up to and including April 21, 2022, and through the date of this Indictment, within the Eastern District of Missouri and elsewhere,

**RAY BRADLEY and
MOREION LINDSEY,**

together with other persons known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, and agree to commit an offense against the United States of America, to wit, the crime of murder for hire in violation of Title 18, United States Code, Section 1958, by using and causing others to use facilities of interstate commerce, to wit, cellular telephones, with the intent that the murder of Titus Armstead be committed in violation of the laws of the State of Missouri, as consideration for the receipt of, and as consideration for a promise and agreement to pay things of pecuniary value, namely, money, along with other benefits. Said conspiracy resulted in the death of Titus Armstead on April 21, 2022.

COUNT II
[MURDER FOR HIRE: 18 U.S.C. §§1958 & 2]

The Grand Jury further charges that:

On or about April 21, 2022, in the City of St. Louis, within the Eastern District of Missouri,

**RAY BRADLEY and
MOREION LINDSEY,**

the defendants herein, aiding and abetting one another and others known and unknown to the Grand Jury, used and caused others to use facilities of interstate commerce, to wit, cellular telephones, with the intent that the murder of Titus Armstead be committed in violation of the State of Missouri, as consideration for the receipt of, and as consideration for a promise and agreement to pay things of pecuniary value, namely money, along with other benefits. Said offense resulted in the death of Titus Armstead on April 21, 2022.

In violation of Title 18, United States Code, Sections 1958 and 2.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) & 924 and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 1958, as set forth in Counts I and II, the defendant(s) shall forfeit to the United States of America any property, real or personal, which constitutes or derived from proceeds traceable to such offense, and also any firearm or ammunition involved in or used in such offense.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, which constitutes or derived from proceeds traceable to such offense, for

offenses charged in Counts I and II.

3. Specific property subject to forfeiture includes, but is not limited to, the following:
 - a. Approximately \$6,064.00 U.S. Currency;
 - b. Approximately \$326,367.00 U.S. Currency;
 - c. 2008 Chevrolet Suburban 1500 Utility 4D LTZ, VIN: 3GNFK16348G149912;
 - d. 2019 Audi Q8, VIN: WA1CVAF18KD018806; and
 - e. 2015 Ford Commercial Van 250; VIN: 1FTNR1YMXFKA96399.

4. If any of the property described above, as a result of any act or omission of the defendant(s):
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

ANGIE E. DANIS, #64805MO
NATHAN L. CHAPMAN, #60978MO
Assistant United States Attorney